

**KEYA C. DENNER, ESQ.**  
**NORRIS McLAUGHLIN & MARCUS, P.A.**  
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*Attorneys for Plaintiffs, Robert Gregory,  
Samuel Gregory and Christopher Gregory*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ROBERT GREGORY, SAMUEL : ELECTRONICALLY FILED  
GREGORY, and CHRISTOPHER :  
GREGORY, :  
Plaintiffs, : Civil Action No.: 2:15-cv-00320(WHW)(CLW)  
v. :  
NOTICE OF MOTION COMPELLING  
W. PATRIC GREGORY III, : PRODUCTION OF DOCUMENTS AND  
Defendant, : COMPLIANCE WITH THIRD-PARTY  
----- X SUBPOENAS

TO: Laurence B. Orloff, Esq.  
Orloff, Lowenbach, Stifelman & Siegel, P.A.  
101 Eisenhower Parkway, Suite 400  
Roseland, New Jersey 07068-1097  
-and-  
Michael S. Haratz, Esq.  
Haratz Law LLC  
50 Division Street, Suite 501  
Somerville, New Jersey 08876  
*Attorneys for Defendant*

Bruce H. Matson, Esq.  
Chief Legal Officer  
LeClair Ryan  
919 East Main Street  
Twenty-Fourth Floor  
Richmond, VA 23219

Joseph Cipolla, CPA  
Cipolla & Co., LLC  
851 Franklin Lakes Road  
Franklin Lakes, NJ 07417

SIRS:

PLEASE TAKE NOTICE that on Monday, May 2, 2016, at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned, attorneys for Plaintiffs Robert Gregory, Samuel Gregory, and Christopher Gregory ("Plaintiffs"), shall move, pursuant to Fed. R. Civ. P. 37 and 45, before the United States District Court for the District of New Jersey (Hon. Cathy L. Waldor, U.S.M.J.), at the Martin Luther King, Jr. Federal Building & United States Courthouse, 50 Walnut Street, Newark, New Jersey, for an Order compelling: (1) the production of documents pursuant to Fed. R. Civ. P. 37; and (2) compliance with subpoenas pursuant to Fed. R. Civ. P. 45.

PLEASE TAKE FURTHER NOTICE that in support of said motion, Plaintiffs shall rely upon the Declaration of Keya C. Denner, Esq. and Brief submitted herewith.

PLEASE TAKE FURTHER NOTICE that Plaintiffs hereby waive oral argument unless opposing papers are timely filed and served.

A proposed form of Order is submitted herewith.

NORRIS, McLAUGHLIN & MARCUS, P.A.  
*Attorneys for Plaintiffs, Robert Gregory,  
Samuel Gregory and Christopher Gregory*

By: \_\_\_\_\_ /s/ *Keya C. Denner* \_\_\_\_\_  
KEYA C. DENNER

Dated: April 8, 2016

CERTIFICATION OF SERVICE

I hereby certify that on today's date, copies of the within motion papers were served, via the Court's electronic filing system, upon:

Laurence B. Orloff, Esq.  
Orloff, Lowenbach, Stifelman & Siegel  
101 Eisenhower Parkway  
Roseland, New Jersey 07068-1097  
Attorneys for Plaintiffs

Michael S. Haratz, Esq.  
LeClairRyan  
One Riverfront Plaza  
1037 Raymond Boulevard, 16<sup>th</sup> Floor  
Newark, New Jersey 07102  
Attorneys for Plaintiffs

I hereby certify that on today's date, copies of the within motion papers were sent by regular mail to:

Bruce H. Matson, Esq.  
Chief Legal Officer  
LeClair Ryan  
919 East Main Street  
Twenty-Fourth Floor  
Richmond, VA 23219

Joseph Cipolla, CPA  
Cipolla & Co., LLC  
851 Franklin Lakes Road  
Franklin Lakes, NJ 07417

I hereby certify that the foregoing statement made by me is true. I am aware that if the foregoing statement is willfully false, I am subject to punishment.

\_\_\_\_\_  
*/s/ Keya C. Denner*  
KEYA C. DENNER

Dated: April 8, 2016